

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

THERESA M. OWENS,

Plaintiff,

v.

ELI LILLY AND COMPANY,

Defendant.

CIVIL ACTION No. 04-11562 (JLT)

**DEFENDANT ELI LILLY AND COMPANY'S
LIST OF PROPOSED DEPOSITIONS**

Defendant Eli Lilly and Company ("Lilly") may depose the following witnesses during the course of discovery in the above-captioned matter:

1. Dr. Merle Berger (Plaintiff's expert and treater; and
2. Dr. Ann Goulart (Plaintiff's treater).


Lilly reserves the right to supplement and/or amend this list as discovery progresses. Lilly has already deposed the following individuals:

1. Theresa Owens (Plaintiff);
2. Robert Owens (Plaintiff's husband);
3. Patricia Kelley (Plaintiff's mother); and
4. Paul Kelley (Plaintiff's father).

Respectfully submitted,

ELI LILLY AND COMPANY

By Its Attorneys,



James J. Dillon (BBO # 124660)

Brian L. Henninger (BBO # 657926)

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Dated: July 28, 2005

CERTIFICATE OF SERVICE

I certify that a true copy of the foregoing List of Proposed Deponents was served on July 28, 2005 by .pdf file via electronic mail, upon:

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